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23 UNITED STATES DISTRICT COURT
24 NORTHERN DISTRICT OF CALIFORNIA
25 SAN FRANCISCO DIVISION

26 JUNIPER NETWORKS, INC. and
APSTRA, INC.,

Plaintiffs,

v.

SWARM TECHNOLOGY LLC,

Defendant.

CASE NO. 3:20-cv-03137-JD

**JOINT STIPULATION EXTENDING
DEADLINES FOR FILING
RESPONSE AND REPLY TO MOTION
TO DISMISS**

Pursuant to Civil Local Rules 6-2(a) and 7-12, Plaintiffs, Juniper Networks, Inc. and Apsara, Inc. (collectively “Juniper”), and Defendant, Swarm Technology LLC (“Swarm”), stipulate, subject to the Court’s approval, to extend the deadline for Juniper to file its Response to Swarm’s Motion to Dismiss (Dkt. No. 39) from April 30, 2021 to May 21, 2021 and the date for Swarm to file its Reply in support of its Motion to Dismiss from May 7, 2021 to May 28, 2021. The parties also stipulate, subject to the Court’s approval, that the hearing on Swarm’s motion to dismiss be held on June 10, 2021 at 10:00 am.

The parties respectfully request that the Court extend these deadlines to allow for jurisdictional and venue discovery that Juniper asserts is relevant to the motion to dismiss. The parties have agreed to the following limitations on venue and jurisdictional discovery, which shall be completed by May 14, 2021.

- Three interrogatories related to venue and jurisdictional issues, and
- A four-hour deposition of Swarm’s corporate representative Alfonso Iniguez in his personal capacity and as a 30(b)(6) witness related to venue and jurisdictional issues.

No other deadlines will be impacted by this extension of time. The parties have previously stipulated to two extensions for Swarm to respond to Juniper’s original complaint (Dkt. Nos. 16-17) and an extension for Juniper to respond to Swarm’s original motion to dismiss (Dkt. No. 21).

Accordingly, the parties respectfully request that the Court enter this stipulation.

Respectfully submitted,

Dated: April 29, 2021

By: /s/ R. William Sigler

R. William Sigler

Counsel for Plaintiffs

JUNIPER NETWORKS, INC. and APSTRA, INC.

Dated: April 29, 2021

By: /s/ Suneel Jain

Suneel Jain

Counsel for Defendant

SWARM TECHNOLOGY LLC

Filer's Attestation: I attest that counsel for the parties have concurred in this filing.

/s/ R. William Sigler

PURSUANT TO STIPULATION, IT IS SO ORDERED

Dated:

/s/